

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**0.1785 ACRES OF LAND, MORE OR
LESS, SITUATE IN CHESAPEAKE
VIRGINIA, AND MSF INVESTORS II,
LLC, ET AL.,**

Defendants.

Civil Case No. 2:24-cv-00023-AWA-RJK

**UNITED STATES' UNOPPOSED MOTION TO CONTINUE
DISCOVERY AND MOTION DEADLINES**

Plaintiff United States of America respectfully submits this Unopposed Motion to Continue Discovery and Motion Deadlines. This motion is supported by the accompanying memorandum. A proposed order is included as an attachment to this filing.

The United States conferred with Counsel for the parties who have appeared and remain in this case: Defendants MSF Investors II, LLC, Arcadia Equity Associates, and Starbucks Corporation. These parties do not oppose this Motion.

DATED: March 17, 2025

Respectfully submitted,

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UNITED STATES ATTORNEY

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PRINCIPAL DEPUTY ASSISTANT
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Attorneys for Plaintiff United States of America

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the above document with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice.

I further certify that the foregoing Motion was mailed to the following parties:

City of Chesapeake, Virginia City Attorney for the City of Chesapeake, Virginia 306 Cedar Road Chesapeake, VA 23322	H Huynh LLC, <i>a Virginia limited liability company</i> c/o Huy Huynh, Registered Agent 2617 Moses Grandy Trail, Suite 106 Chesapeake, VA 23323
Bank of America, National Association c/o CT Corporation System, Registered Agent 4701 Cox Road Suite 285 Glen Allen, VA 23060	LOJ Corporation, <i>a Virginia corporation</i> c/o Kyoung H. Lee, Registered Agent 2617 Moses Grandy Trail, Suite 108 Chesapeake, VA 23323
Protective Life Insurance Company, <i>a Tennessee Corporation</i> c/o CT Corporation System, Registered Agent 4701 Cox Road Suite 285 Glen Allen, VA 23060	Mohamed Arfaoui 2617 Moses Grandy Trail, Suite 110 Chesapeake, VA 23323
B. Randolph Boyd, <i>in his capacity as Trustee of the Credit Line Deed of Trust and Security Agreement dated October 27, 1997</i> 4343 Kimages Wharf Road Charles City, VA 23030	Deep Creek Pizza LLC, <i>a Virginia limited liability company</i> c/o Kristen Jurjevich, Registered Agent Pender & Coward, P.C. 222 Central Park Avenue, Suite 400 Virginia Beach, VA 23462
Chang Tao Lin, Inc., <i>a Virginia corporation</i> c/o Chang Tao Lin, Registered Agent 816 S. Rosemont Road Virginia Beach, VA 23452	Dolgen, LLC, <i>a Kentucky limited liability company</i> c/o Corporation Service Company, Registered Agent 100 Shockoe Slip Fl 2 Richmond, VA 23219
Deep Creek Comics, LLC, <i>a Virginia limited liability company</i> c/o Jeffrey Smithwick, Registered Agent 241 Palace Green Blvd Virginia Beach, VA 23452	Samantha Rudolph Photography LLC, <i>a Virginia limited liability company</i> c/o Samantha Rudolph, Registered Agent 2617 Moses Grandy Trail, Suite 120 Chesapeake, VA 23323
Golden China Lee Inc., <i>a Virginia corporation</i> c/o Xin Hai Li, Registered Agent 2617 Moses Grandy Trail, Suite 104 Chesapeake, VA 23323	El Puente II of Chesapeake, Inc., <i>a Virginia corporation</i> c/o Ricardo Perez, Registered Agent 104 Watch Harbour Court Suffolk, VA 23435

Waffle House, Inc., <i>a Georgia corporation</i> c/o Corporation Service Company, Registered Agent 100 Shockoe Slip Fl 2 Richmond, VA 23219	Howard P. Cobb, D.D.S., P.C., <i>a Virginia professional corporation</i> c/o Christopher Graff, Registered Agent 4912 Athens Boulevard Virginia Beach, VA 23455
Lynch Family LLC, <i>a Virginia limited liability company</i> c/o John C. Lynch, Registered Agent 222 Central Park Avenue, Suite 2000 Virginia Beach, VA 23462	Deacon Insurance Agency, Inc., <i>a Virginia corporation</i> c/o William Stewart Deacon III, Registered Agent 2605 Moses Grandy Trail, Suite A Chesapeake, VA 23323
Advance Auto Parts, Inc., <i>a Delaware corporation</i> c/o Corporation Service Company, Registered Agent 100 Shockoe Slip Fl 2 Richmond, VA 23219	Boddie-Noell Enterprises, Inc., <i>a North Carolina corporation</i> (as successor-by-merger to BNE Restaurant Group II LLC) c/o CT Corporation System, Registered Agent 4701 Cox Road Suite 285 Glen Allen, VA 23060

DATED: March 17, 2025

/s/ Joseph A. Figueroa
Joseph A. Figueroa
Attorney, U.S. Department of Justice